

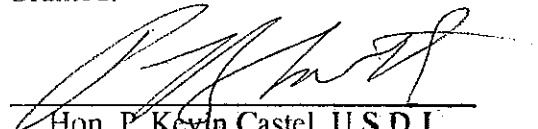
Andrew J. Mollica
Attorney at Law
1205 Franklin Avenue Suite 16LL
Garden City, New York 11530
Tel. (516) 280-3182
Tel. (516) 528-1311
Jdmol@aol.com

August 25, 2020

VIA ECF FILING

Hon. P. Kevin Castel, United States District Judge Application Granted.
United States District Court
Southern District of New York
500 Pearl Street
New York NY 10007

So Ordered:


Hon. P. Kevin Castel, U.S.D.J.
8-26-20

Re: United States v. Grasso et al., 20-Cr. 163 (PKC)

Dear Judge Castel:

I write on behalf of my client, Connor Flynn, to respectfully request that the Court modify his current bail conditions, which limit Mr. Flynn's travel to the Southern and Eastern Districts of New York.

Mr. Flynn seeks to extend the bail conditions to include the Western District of Michigan. My client seeks this modification for the purpose of moving his residence to that area. Mr. Flynn and his family hope to move to that jurisdiction on, or about, October 15, 2020, after the sale of their modular home in Orange County New York is completed.

Mr. Flynn seeks the move to the Western District of Michigan to be closer to his wife's family and obtain new employment in the construction field. Mr. and Mrs. Flynn are the parents of a two-year-old daughter and are expecting a second child in September. Mr. Flynn's wife's parents, who reside within the Western District of Michigan, will assist them in the raising of the children.

Mr. Flynn informs me that he has informed Pre-Trial Services of his intentions and they have no objections. On behalf of the government, Assistant United States Attorney Sarah Montizavi has graciously consented to said request.

Respectfully submitted,
/s/ Andrew J. Mollica
On Behalf of Connor Flynn

SO ORDERED:

Honorable P. Kevin Castel
United States District Judge